UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

NORFOLK & DEDHAM MUTUAL FIRE)	
INSURANCE COMPANY, as subrogee of)	
LTI HARVARD, INC.,)	
Plaintiff,)	Case No.: 1:22-cv-11669-NMG
)	
V.)	
)	
BREN-TRONICS, INC., and)	
SAFT AMERICA, INC.)	
Defendants and Third-Party Plaintiffs.)	
)	
v.)	
)	
GALLEY POWER LLC, and)	
GALLEY POWER, INC.,)	
Third-Party Defendants.)	
)	

JOINT STATEMENT

Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure and Local Rule 16.1, the parties jointly submit the following proposed scheduling order for the above-captioned matter:

A. Proposed Scheduling Order:

Event	Date	
Initial Disclosures	January 7, 2023	
Motions to Amend Pleadings	February 17, 2023	
Written discovery served by	February 17, 2023	
All depositions, other than experts, completed	July 14, 2023	
by		
Fact discovery, other than expert discovery	July 14, 2023	
completed by		
Plaintiff's trial experts designated and	August 25, 2023	
information contemplated by Fed. R. Civ. P.		
26(a)(2) must be disclosed by		
Plaintiff's trial experts must be deposed by	September 29, 2023	
Defendant's trial experts designated and	October 27, 2023	
information contemplated by Fed. R. Civ. P.		
26(a)(2) must be disclosed by		
Defendant's trial experts must be deposed by	December 1, 2023	
Dispositive motions filed by	January 12, 2024	

Oppositions to dispositive motions must be
filed within 21 days after service of the motion

B. Settlement

The Plaintiff submitted settlement demands prior to the filing of the lawsuit.

C. Reassignment to a Magistrate Judge

The parties do not consent to reassignment of the case to a magistrate judge.

D. Local Rule 16.1(d)(3) Certifications

The parties state that they will file their respective certifications under separate cover, prior to the Scheduling Conference.

WHEREFORE, the parties respectfully request that this Honorable Court enter the above Scheduling Order for this matter.

Respectfully Submitted, Norfolk & Dedham Mutual Fire Insurance Company, a/s/o LTI Harvard, Inc., By its attorney,

Bren-Tronics, Inc., By its attorneys,

/s/Edward A. Bopp

Edward A. Bopp, BBO #672367 Monahan & Associates, P.C. 113 Union Wharf East Boston, MA 02109 (617) 227-1500 ebopp@monahanlaw.net /s/Christine A. Knipper

Christine A. Knipper, BBO #652638 Anne V. Kim, BBO #679704 Wilson Elser Moskowitz Edelman & Dicker LLP 260 Franklin Street, 14th Floor Boston, MA 02110 (617) 422-5300 christine.knipper@wilsonelser.com anne.kim@wilsonelser.com

Saft America, Inc., By its attorneys, Galley Power LLC, and Galley Power, Inc., By its attorney,

/s/Paul Michienzie

Paul Michienzie, BBO #548701 Richard E. Bennett, BBO #037740 Adam C. Brandon, BBO #625098 Michienzie & Sawin LLC /s/Christina M. Esposito

Cristina M. Esposito, BBO #693658 Law Offices of Patricia C. Frazier 100 High Street, Suite 610B Boston, MA 02110 745 Boylston Street, 5th Floor Boston, MA 02116 (617) 227-5660 pmichienzie@masatlaw.com rbennett@masatlaw.com abrandon@masatlaw.com

Date: November 30, 2022

(617) 217-2962 cristina.esposito@thehartford.com

CERTIFICATE OF SERVICE

I, Anne V. Kim, hereby certify that I have this 30th day of November 2022, I served a copy of the foregoing document be causing a copy thereof to be sent electronically, through the ECF system, to the registered participants in this case, as identified on the Notice of Electronic Filing (NEF), as well as by electronic mail.

/s/ Anne V. Kim
Anne V. Kim